

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA    )  
  )  
vs.                                    )    NO. 04-30034-MAP  
  )  
MICHAEL CROOKER                )

**DEFENDANT'S MOTION TO APPOINT A SECOND ATTORNEY**

Defendant requests that the court appoint a second attorney, in this case, to assist Attorney Bongiorno. The Government has three attorneys who have filed appearances in this case; the defendant only one.

Attorney Bongiorno is an overworked, high profile, private defense attorney who took on this charity case thinking that it was a simple one count silencer case, when in reality it is much more complicated and the silencer charge is just a ruse, probably never to be prosecuted at all. See Defendant's Motion to Dismiss Due to Scientific Impossibility of Conviction, and Defendant's Motion to Dismiss Due to Deprivation of Speedy Trial and Prosecutorial Misconduct Related Thereto.

This case is no closer to trial than it was a year ago at this time. Defendant has not seen or spoken to Attorney Bongiorno since last year, though there has been some minimal correspondence.

This court has previously appointed the defendant Crooker two attorneys in a civil case. The same needs to happen here. Attorney Bongiorno cannot handle all the work here, plus all his other obligations and trials. Much needs to be done, and done expeditiously, or the defendant could be held for many years without bail, on top of the 21 months of detention that has already occurred.

THE DEFENDANT

BY: /s/ Vincent A. Bongiorno, Esq.  
95 State Street, Suite 309  
Springfield, MA. 01103  
(413) 732-0222  
BBO #049040

CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to Assistant United States Attorney, Kevin O'Regan, Esq., United States District Court, 1550 Main Street, Springfield, Ma. 01103 this 13<sup>th</sup> day of April 2006.

/s/ Vincent A. Bongiorno